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**Melissa E. Newman**  
Vice President – Federal Regulatory

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RECEIVED

February 11, 2005

FEB 11 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-B204  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Federal Communications Commission  
Office of Secretary

Re: *In the Matter of Section 272 (f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112; 2000 Biennial Regulatory Review Separate Affiliate Requirements of Section 64.1903 of the Commission's Rules, CC Docket No. 00-175*

Dear Ms. Dortch:

In response to a request by Wireline Competition Bureau ("WCB") staff to update certain information filed in response to earlier data requests in the above-captioned proceedings, Qwest hereby submits the enclosed information.

Pursuant to the Wireline Competition Bureau's December 22, 2003 *Order*, and its appended *Protective Order*, in the above-captioned (and other) proceedings (18 FCC Rcd. 26595), Qwest is serving a copy of this letter and the enclosed confidential attachments on Ms. Janice Myles<sup>1</sup> of the Competition Policy Division, Wireline Competition Bureau. Each page of the confidential attachments is marked with the legend specified in the *Order* ("CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 02-112, CC DOCKET NOS. 00-175, 01-337, 02-33, before the Federal Communications Commission").

The information to be submitted is described as follows:

- (1) Number of Resold Lines for Qwest Communications ("QC"), for Residence, Business and Total, cumulative quarterly totals by state, beginning with fourth quarter 2003 through fourth quarter 2004. (See Attachment 1)

<sup>1</sup> Courtesy copies of this letter are also being served on the FCC staff identified on page 3.

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(2) CLEC E911 Records for Residence, Business and Total, cumulative quarterly totals by state, beginning with fourth quarter 2003 through fourth quarter 2004. (See Attachment 2)

(3) QC Access Lines for Residence, Business and Total, cumulative quarterly totals by state, beginning with fourth quarter 2003 through fourth quarter 2004. (See Attachment 3)

(4) Number of unbundled network element platform circuits ("UNE-P") for QC, for Residence, Business and Total, cumulative quarterly totals by state, beginning with second quarter 2003 through fourth quarter 2004. In order, to provide Residence and Business amounts for fourth quarter 2003, derived estimates were used based on second quarter 2003 amounts. Therefore, this filing includes second quarter 2003 through fourth quarter 2004 UNE-P data. (See Attachment 4)

Notwithstanding the *Protective Order* adopted in these proceedings, Qwest believes there is also a separate statutory basis for not making this confidential information available for public inspection. See 47 C.F.R. § 0.457(d). The non-redacted portions of this submission contain Qwest's confidential information. Disclosure may cause substantial competitive harm to Qwest. Accordingly, the non-redacted information is appropriate for non-disclosure both under Section 0.457(d) and the *Protective Order*.

As required by the Wireline Competition Bureau's *Order* and *Protective Order*, Qwest is also submitting one copy of the non-redacted attachments to the Secretary's office. In addition, Qwest is submitting under separate cover to the Secretary's office, two redacted copies of the confidential attachments. As required by the *Order*, the cover letter and redacted copies will include the following legend: "REDACTED – FOR PUBLIC INSPECTION".

Acknowledgment and date of receipt of this submission are requested. A duplicate copy is included for this purpose. Please date-stamp the duplicate copy upon receipt and return it to the courier. If you have any questions regarding this submission, please contact the undersigned at the contact information reflected in the letterhead.

Sincerely,

/s/ Melissa E. Newman

Attachments enclosed

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cc: Renee Crittendon ([renee.crittendon@fcc.gov](mailto:renee.crittendon@fcc.gov))  
Pamela Megna ([pamela.megna@fcc.gov](mailto:pamela.megna@fcc.gov))  
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**ATTACHMENT 1**

**Resold Lines\***

<i>State</i>	<b>Dec 03</b>			<b>Mar 04</b>			<b>Jun 04</b>		
	<i>BUS</i>	<i>RES</i>	<i>Total</i>	<i>BUS</i>	<i>RES</i>	<i>Total</i>	<i>BUS</i>	<i>RES</i>	<i>Total</i>
AZ									
CO									
IA									
ID									
MN									
MT									
ND									
NE									
NM									
OR									
SD									
UT									
WA									
WY									
Total									

<i>State</i>	<b>Sep 04</b>			<b>Dec 04</b>		
	<i>BUS</i>	<i>RES</i>	<i>Total</i>	<i>BUS</i>	<i>RES</i>	<i>Total</i>
AZ						
CO						
IA						
ID						
MN						
MT						
ND						
NE						
NM						
OR						
SD						
UT						
WA						
WY						
Total						

\* Resale in service as of the last day of the month listed.

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ATTACHMENT 2

**CLEC E911 Records  
(Only Qwest Franchise Service Area)**

	<b>Dec 03</b>	<b>Mar 04</b>	<b>Jun 04</b>	<b>Sep 04</b>	<b>Dec 04</b>
AZ					
BUS					
RES					
TOTAL					
CO					
BUS					
RES					
TOTAL					
IA					
BUS					
RES					
TOTAL					
ID					
BUS					
RES					
TOTAL					
MN					
BUS					
RES					
TOTAL					
MT					
BUS					
RES					
TOTAL					
ND					
BUS					
RES					
TOTAL					
NE					
BUS					
RES					
TOTAL					
NM					
BUS					
RES					
TOTAL					

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OR  
BUS  
RES  
TOTAL  
SD  
BUS  
RES  
TOTAL  
UT  
BUS  
RES  
TOTAL  
WA  
BUS  
RES  
TOTAL  
WY  
BUS  
RES  
TOTAL  
Qwest Total  
BUS  
RES  
TOTAL

**NOTES:**

(1) The source of this data is Intrado, the 911 administrator for Qwest's service area. Intrado collects E911 data from CLECs operating in Qwest states. Qwest has no involvement in the collection of the data nor does Qwest have any knowledge as to the timeliness or accuracy of the data. It should be noted that CLEC E911 records are associated only with lines served via CLEC-owned facilities or via stand-alone UNE loops. Any CLEC lines served via resale or UNE-P are reported to Intrado as Qwest records, since those lines are served via Qwest-owned switches.

(2) CLEC E911 records should not be equated to access lines in service, since some CLECs report DID numbers to Intrado, while others do not report data for inbound-only lines (those incapable of originating calls for 911 emergency assistance).

(3) Qwest believes that CLEC E911 data is a good indicator that CLECs are capturing an increasing share of local exchange market and of competitive trends in this market.

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ATTACHMENT 3

## Access Lines

	Dec 03	Mar 04	Jun 04	Sept 04	Dec 04
AZ	BUS				
	RES				
AZ Total					
CO	BUS				
	RES				
CO Total					
IA	BUS				
	RES				
IA Total					
ID	BUS				
	RES				
ID Total					
MN	BUS				
	RES				
MN Total					
MT	BUS				
	RES				
MT Total					
ND	BUS				
	RES				
ND Total					
NE	BUS				
	RES				
NE Total					
NM	BUS				
	RES				
NM Total					
OR	BUS				
	RES				
OR Total					
SD	BUS				
	RES				
SD Total					
UT	BUS				
	RES				
UT Total					
WA	BUS				
	RES				
WA Total					

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WY	BUS RES
WY Total	
Grand Total	



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**ATTACHMENT 4**

**UNE-P**

UNE-P Telephone Numbers in Service			
STATE	UNE-P Telephone Numbers in Service	UNE-P Telephone Numbers in Service	UNE-P Telephone Numbers in Service
AZ			
CO			
ID			
IA			
MN			
MT			
NE			
NM			
ND			
OR			
SD			
UT			
WA			
WY			
Total			

Note: June 2003 UNE-P telephone numbers in service were compared to the 1/23/04 white pages listings database to identify residential UNE-P white pages listings.

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AZ			
CO			
ID			
IA			
MN			
MT			
NE			
NM			
ND			
OR			
SD			
UT			
WA			
WY			
Total			

Note: Sept. 2003 residential and business UNE-P quantities were derived by multiplying 9/30/03 UNE-P totals by the residential and business UNE-P ratios for June 2003, since a special study was not conducted to develop a residential/business UNE-P split for Sept. 2003.

AZ			
CO			
ID			
IA			
MN			
MT			
NE			
NM			
ND			
OR			
SD			
UT			
WA			
WY			
Total			

Note: Dec. 2003 residential and business UNE-P quantities were derived by multiplying 12/31/03 UNE-P totals by the residential and business UNE-P ratios for June 2003, since a special study was not conducted to develop a residential/business UNE-P split for Dec. 2003.

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AZ			
CO			
ID			
IA			
MN			
MT			
NE			
NM			
ND			
OR			
SD			
UT			
WA			
WY			
Total			

Note: March 2004 residential and business UNE-P quantities were derived by multiplying 3/31/04 UNE-P totals by the residential and business UNE-P ratios for June 2004, since a special study was not conducted to develop a residential/business UNE-P split for March 2004.

AZ			
CO			
IA			
ID			
MN			
MT			
ND			
NE			
NM			
OR			
SD			
UT			
WA			
WY			
Total			

Note: June 2004 UNE-P telephone numbers in service were compared to the 8/13/04 white pages listings database to identify residential UNE-P white pages listings.

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AZ			
CO			
IA			
ID			
MN			
MT			
ND			
NE			
NM			
OR			
SD			
UT			
WA			
WY			
Total			

Note: September 2004 residential and business UNE-P quantities were derived by multiplying 9/30/04 UNE-P totals by the residential and business UNE-P ratios for December 2004, since a special study was not conducted to develop residential/business UNE-P split for September 2004.

(\*) Excludes approximately                      UNE-P lines converted to the commercial Qwest Platform Plus ("QPP") product as of 9/04.

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AZ			
CO			
IA			
ID			
MN			
MT			
ND			
NE			
NM			
OR			
SD			
UT			
WA			
WY			
Total			

Note: December 2004 UNE-P telephone numbers in service were compared to the 1/12/05 white pages listings database to identify residential UNE-P white pages listings.

(\*) Excludes approximately UNE-P lines converted to the commercial Qwest Platform Plus ("QPP") product as of 12/04.

General UNE-P Note: Qwest does not have a standard process to identify UNE-P lines by type of service (e.g., residential versus business). To the extent telephone numbers associated with UNE-P lines in service are in the Qwest white pages database, the telephone number can be identified as being in the residential or business section. Qwest relies on UNE-P white pages directory listings to estimate the number of residential and business UNE-P lines in service shown above.